

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF TENNESSEE**

**RISK MANAGEMENT, INC., individually)
and on behalf of all those similarly situated,)**

Plaintiff,)

v.)

**TEAM HEALTH HOLDINGS, INC.,)
AMERITEAM SERVICES, LLC, and)
HCFS HEALTH CARE FINANCIAL)
SERVICES, LLC,)**

Respondents.)

Case No. 3:22-cv-00456-DCLC-DCP

STIPULATION AND ORDER FOR AMENDMENT AND BRIEFING SCHEDULE

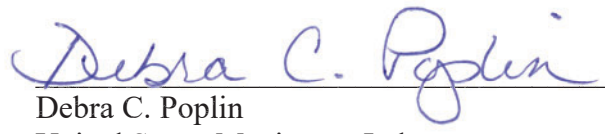
Plaintiff, Risk Management, Inc., and Defendants, Team Health Holdings, Inc., Ameriteam Services, LLC, and HCFS Health Care Financial Services, LLC, through their respective counsel, hereby stipulate and agree as follows:

1. Plaintiff shall file its First Amended Complaint (“FAC”) by Monday, March 13, 2023.
2. Following the filing of the FAC, Plaintiff may not amend its complaint absent “the opposing party's written consent or the court's leave. The court should freely give leave when justice so requires.” Fed. R. Civ. P. 15(a)(2).
3. Defendants anticipate that, following Plaintiff’s filing of its FAC, Defendants will move to dismiss for failure to state a claim, will move to strike the class allegations from the FAC, and will move to stay discovery pending resolution of the motions to dismiss and to strike.
4. The parties agree to the following stipulated briefing schedule:

- a. Defendants shall respond to the FAC and move to stay discovery pending resolution of their anticipated motions to dismiss and to strike by April 12, 2023.
 - b. Plaintiff shall respond to Defendants' motions to dismiss, to strike, and to stay discovery by May 3, 2023.
 - c. Defendants shall file any replies in support of their motions to dismiss, to strike, and to stay discovery by May 17, 2023.
5. In agreeing to this Stipulation, all parties preserve any and all rights and defenses.

IT IS SO ORDERED.

ENTER:


Debra C. Poplin
United States Magistrate Judge

APPROVED FOR ENTRY

Dated: March 1, 2023

s/ Mary Parker

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